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August 15, 2023

Via CM/ECF

Honorable Eleanor L. Ross
US District Court, Northern District of Georgia,
Atlanta Div.
1788 Richard B. Russell Federal Building
75 Ted Turner Drive, SW
Courtroom: 1708
Atlanta, GA 30303-3309

Re: *Ramirez v. The Paradies Shops, LLC*, United States District Court for the Northern
District of Georgia - Atlanta Division
Civil Action File No.: 1:21-cv-03758-ELR

Dear Judge Ross:

The parties in this litigation are engaged in settlement talks and are arranging third-party mediation. Once the mediation date is scheduled, we will reach back out to the Court to inform you of the date, and after the mediation, its outcome. We are hopeful that we will find a mutually acceptable resolution to this case. All parties have agreed to hold off on the 26(f) Conference and the filing of a Joint Preliminary Report and Discovery Plan and to toll the deadline for a determination under Fed. R. Civ. P. 23(c)(1), *see* LR 23.1(B), while we engage in good faith settlement negotiations.

Respectfully,

HOLLAND & KNIGHT LLP



Peter N. Hall

PNH:lcr

Honorable Eleanor L. Ross

August 15, 2023

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cc: Dylan A. Bess, Esq.
John A. Yanchunis, Esq.
Ryan D. Maxey, Esq.